

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CHANDRASI GAEKWAR, a single
individual,

Plaintiff,

v.

AMICA MUTUAL INSURANCE
COMPANY, a foreign corporation,

Defendant.

No. 2:22-cv-1551-BJR

**STIPULATION AND PROTECTIVE
ORDER**

Noting Date: May 1, 2023
Without Oral Argument

STIPULATION

Come now the parties above named by and through their respective counsel of record
and hereby stipulate that the following Protective Order be entered:

Dated this 1st day of May, 2023.

Prepared & Presented by:

DAVID J. BALINT, PLLC

s/ David J. Balint
David J. Balint (WSBA #5881)
Of Attorneys for Plaintiff

Approved as to Form & for Presentation:

WATHEN | LEID | HALL | RIDER, P.C.

s/ Lucy B. Wilhelm
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STIPULATION AND PROTECTIVE ORDER - 1

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(206) 622-0494/FAX (206) 587-2476

ORDER

This matter having come on duly before the undersigned judge pursuant to the foregoing stipulation, it is hereby Ordered that as to the following documents to be marked “CONFIDENTIAL”:

- a. Claims Handling Training Manuals
- b. Employee Training Manuals and Materials
- c. _____

Said records shall be utilized only for the purposes of this litigation and shall not otherwise be disclosed or disseminated.

That the attorneys for the parties hereto may copy and disseminate such documents to witnesses (including experts) as they deem, in good faith, to be necessary subject to the following restrictions:

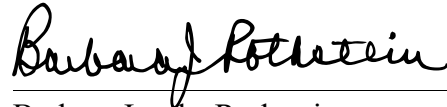
(A) That a copy of this Stipulation and Order shall be given to any such outside person and they will document in writing (by email or fax or letter) their agreement to abide by the terms of this protective order, prior to such persons being provided with the documents.

(B) That such outside persons or entities to whom the documents have been provided shall return all copies to the attorney providing the same, or certify their destruction of at the conclusion of the litigation, and they shall not thereafter retain copies. This includes electronically provided and stored documents.

That if any party intends to file said discovery documents, with the court it shall be done only in good faith by the attorney submitting the same, in support of or in opposition to motions or for trial exhibit purposes. Advance notice of the intent to so file documents shall be given to the other parties hereto at least nine court days before the same are filed in order to give any party the right move for an order to seal any such documents.

That any party has the right to move to seal any document whether before or after submission to the court.

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2 DATED this 1st day of May, 2023.
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5 Barbara Jacobs Rothstein
6 U.S. District Court Judge
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